

Mark E. Nunnelly Commissioner of Revenue

Sean R. Cronin Senior Deputy Commissioner

To: Regional School District Business Officials

From: Anthony A. Rassias, Deputy Director of Accounts

Date: July, 2015

This letter sets forth the year-end reporting requirements pursuant to G.L. chapter 71, § 16B½ and 603 CMR 41.06 for certification of excess and deficiency (E & D) for the General Fund and certain other related matters.

E & D used as part of the certification of assessments to member communities must first be certified by the Director of Accounts. Use prior to certification will be considered defective.

New this year

• ERIP – The State's Early Retirement Incentive Program

At the close of business on June 30, the Bureau of Accounts lost the permanent services of 7 colleagues, both supervisors and staff, who together had over 200 years of service to the Bureau, the Commonwealth's cities, towns and districts and to the Commonwealth's taxpayers. Their jobs were well done and the Bureau wishes them all the best in their retirement.

As you can imagine, this loss of personnel will undoubtedly impact Bureau operations for the near future. Nonetheless, the Bureau intends to:

- maintain its certification standard for excess and deficiency;
- complete its work as efficiently as possible; and
- maintain a field representative model.

We will make every effort to complete our balance sheet review and to certify excess and deficiency for those districts that need an amount for an impending meeting. Depending upon workload, balance sheets for districts where excess and deficiency certification is not immediately necessary will be reviewed as soon as possible. Please be certain that the balance sheet presentation will allow us to calculate excess and deficiency with a minimum of questions. Otherwise, we must set it aside for review at a later date.

Supporting a Commonwealth of Communities mass.gov/DLS P.O. Box 9569 Boston, MA 02114-9569 (617) 626-2300

Grant Reimbursements

Expenditures made in anticipation of State grant reimbursements that were subsequently reduced or eliminated in FY2015 and which caused a deficit in the grant account as of June 30, 2015 and for which reimbursement is no longer anticipated must be provided for in the FY2016 regional school district budget if not provided for in FY2015.

 Only balance sheets that have been closed as of 6/30/2015 will be accepted for certification of excess and deficieicy.

The balance of information in this letter is updated and continued from last year

Balance Sheet – Form Submission Requirements

All procedures necessary to properly close accounting records should be completed. Preclosing trial balances will not be accepted. Submit hard-copy documentation not already entered or uploaded into Gateway.

UMAS accounting does not require that local governmental entities convert their chart of accounts to conform to GASB 54 definitions. The Bureau will expect fund balance definitions to appear as in the past.

The following required forms are down-loadable from the DLS website when linked and are uploadable or data entered into Gateway under Misc Forms:

- Combined Balance Sheet and Combining Balance Sheets for each fund type including individual fund balances (may include a system generated balance sheet);
- Detailed analysis of undesignated fund balance/surplus revenue:
- FY2015 Year End Checklist;
- Cash Reconciliation Form;
- Treasurer's Year End Cash Report as of June 30;
- Statement of Indebtedness as of June 30:
- Summary of the FY2016 budget (operating and capital);
- Schedule of assessments to each member city and town;
- Audited financial statements if required by the Director;
- Other information as requested by the Bureau.

Please be reminded that monthly regional school district state aid in whole or in part may be withheld if the regional school district has not filed the required balance sheet forms and schedules as of June 30, 2015 to the Bureau of Accounts by October 31, 2015. To be properly filed, the forms indicated above must be completed and submitted to the Bureau.

For jurisdictions in which the Director of Accounts requires audited financial statements prior to certification of E & D, the Director may decide not to certify an amount if the independent auditor's opinion is adverse or if the opinion is disclaimed.

Balance Sheet Presentation

Submit hard-copy documentation allowing sufficient time for Bureau review and certification as well as for local action.

- For revenue recognition purposes, state and federal reimbursements must be received by September 30 to offset a deficit fund balance as of June 30.
- At the discretion of the Commissioner of the Department of Elementary and Secondary Education (DESE), funding below the proper net school spending threshold level could result in a loss of State aid.
- Forms indicated by links under Balance Sheet Form Submission Requirements are now available to regional school districts.
- Invested funds must be reported at fair value as of June 30.
- Incurred But Not Reported claims must be accrued and reported on the balance sheet.
 A June 30, 2015 deficit in this fund by law must be provided for in the FY2016 regional school district budget.
- The State Special Education Reimbursement Fund (Circuit Breaker) June 30 balance can be no greater than DESE's FY2015 reimbursement, not including extraordinary assistance or funds obligated by the regional school district committee for FY2016 purposes. Any excess fund balance must close to the General Fund on June 30. Any FY2015 deficit in the fund must be charged to the FY2016 regional school district budget and will have no effect on June 30, 2015 E & D. Proof of this charge must be provided to the Bureau of Accounts, otherwise E & D will be reduced.
- Massachusetts School Building Authority (MSBA) lump-sum payments may require reservation and amortization. Review <u>IGR 08-102</u> for instructions.

Inter-fund borrowing advances must be repaid no later than June 30. <u>IGR 92-105</u>.
 Debt authorized for jurisdictions under legal restriction to obtain approval from the

Commissioner of Revenue must first receive local approval and then the Commissioner's before inter-fund borrowing and expenditure of funds can occur.

- Reservations of interest income from investments, certain bond/BAN premiums, rebates
 and medicare/medicaid reimbursements are improper and unless special legislation or
 the Director of Accounts requires such reservation, they must be closed to the district's
 General Fund. Also, close all encumbrances to the General Fund not supported by a
 legal commitment made to a third party.
- Any bond or bond anticipation note premium that will not be returned to the member communities because of debt exclusion votes taken by the members, must be closed to the district's General Fund on June 30. Per G.L. chapter 44, § 20, the Bureau must then reduce the members' debt exclusions by the amount that represents their proportionate share of the premium kept by the district through maturity of the debt. Otherwise, the premium must be reserved and returned to district members by no later than June 30. The return of premium may be either by a reduction to the capital assessment or by separate check.
- For calculating the maximum Excess and Deficiency (E & D) under G.L. c. 71, § 16B½
 as of June 30, 2015, the Bureau will use five percent (5%) of the district's operating and
 capital budget for the subsequent fiscal year. Per 603 CMR 41.05 1(e):

Expenditures from grant funds, revolving funds, trust funds and other funds that by law may be expended by the regional school committee without further appropriation, shall not be included in the budget. A summary of projected receipts and expenditures in such funds shall be provided to the members for informational purposes only along with the budget.

Therefore, the Bureau will multiply five percent (5%) by the budget as defined by DESE.

- E & D will be reduced by the amount of any federal school grant reported in deficit since June 30, 2013.
- Rebated funds (e.g. energy rebates) received from a utility or other vendor cannot be reserved on the balance sheet and must be closed to the General Fund at the end of the fiscal year.
- Chapter 165 of 2012, §§ 116 and 136 amends G.L. c. 58, § 18C to require that certain local aid distributions, including Unrestricted General Government Aid, Chapter 70 and State-owned Land reimbursements, be paid on a monthly basis rather than quarterly or annually.

• <u>Bulletin 2013-01B</u>, which supersedes prior Bulletins on the matter, explains the application of premiums received in connection with the sale of bonds or notes that are subject to an approved Proposition 2½ debt exclusion generally and announces an alternative method for applying them.

Potential Increases to E & D

The following amounts may be requested by the jurisdiction's accounting official to be included in the certification:

- FY2015 state aid payments received by September 30;
- Other reimbursements received by September 30 for FY2015 expenditures that resulted in deficit fund balances as of June 30 may be applied to offset the deficit.

Potential Decreases to E & D

The following reasons will contribute to an E & D reduction unless otherwise noted. The Director may reduce the calculated amount of E & D if, in his opinion, the calculated amount cannot be substantiated by supporting documentation.

- A variance between the balance sheet and treasurer's cash:
- Illegal deficits or any deficit not provided for in the district assessment;
- An individual Capital Projects Fund fund balance deficit unless funds were borrowed by June 30:
- A self-insurance health claims trust fund balance deficit (note: must be provided for in next regional school district budget):
- FY2015 circuit breaker fund balance deficit not charged to FY2016 school budget.

Treasurer's Year-End Cash Report (formerly the Treasurer's Quarterly Cash Report)

The Treasurer's Year-End Cash Report as of June 30, 2015 must be completed and returned to the Bureau by September 30, 2015 or upon submission of the balance sheet for FY2016 excess & deficiency certification, whichever is earlier.

Although the Quarterly Cash Report has been replaced, the Treasurer's and Accounting Officer's records should be reconciled monthly during the year.

Auto E-Mail of E & D Certification

Certification letters will be e-mailed to the superintendent and school business manager, the board of selectmen in each member town and the city council in each member city immediately upon approval, provided an e-mail address is reported in DLS' Local Officials Directory.

Distribution of Local Aid

Regional school districts are reminded of G.L. chapter 58, § 18F which provides for the withholding of local aid payments to districts that do not submit a prior year's annual financial report to DESE.